

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas

FILED

JUL 25 2017

Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Michael Tienping TANG
YOB: 1988 Citizenship: USC**SEALED**

Case No. M-17-1316-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 30, 2017 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2251(a) and (e)

Sexual exploitation of a minor child

18 U.S.C. 2422(b)

Knowingly enticing and coercing an individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity

This criminal complaint is based on these facts:

See the attached Affidavit

☒ Continued on the attached sheet.

Approved to file:

AUSA

Complainant's signature

Steven Fuentes, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/25/2017

Judge's signature

City and state: McAllen, Texas

Dorina Ramos, U.S. Magistrate

Printed name and title

Attachment "A"

In May 2017, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), McAllen, Texas (TX), received information from an administrator at Juarez-Lincoln High School in Mission, Hidalgo County, Texas, concerning the online exploitation of a 15-year old male (Minor Victim 1) and a 16-year old female (Minor Victim 2). Based on subsequent interviews, HSI McAllen determined that Minor Victim 1 and Minor Victim 2 were coerced into producing, and then sending, images and videos depicting them engaged in sexually explicit conduct, to the Facebook profile "Roxana Scarlett".

An interview of Minor Victims 1 and 2 revealed that after accepting a "friend" request from a "Roxanna Scarlett" on Facebook, "Roxanna Scarlett" began requesting that they create and send nude pictures and videos depicting the minor victims in acts of masturbation. Minor Victims 1 and 2 complied with that request. Shortly after, Minor Victims 1 and 2 blocked "Roxanna Scarlett" from their Facebook accounts and "Roxanna Scarlett" began reaching out to the Facebook friends of Minor Victims 1 and 2 in an attempt to get unblocked. Minor Victim 2 stated that another Facebook user named "Mike Boss" claimed to have received photos of her from "Roxanna Scarlett." Minor Victims 1 and 2 subsequently unblocked "Roxanna Scarlett" who then demanded that they perform and record themselves involved in various sexual acts with each other and to then send the recordings to "Roxanna Scarlett" via Facebook. "Roxanna Scarlett" threatened to release, to friends and family members, the already collected images and videos of Minor Victims 1 and 2 if they refused to comply.

In response to the threats made by "Roxanna Scarlett", Minor Victim 1 and Minor Victim 2 engaged in various sexual acts with each other. These acts of sexually explicit conduct were video recorded and delivered to "Roxanna Scarlett" via Facebook. One such video that was discovered by federal agents during a review of Minor Victim 1's Facebook account, was sent to "Roxanna Scarlett" by Minor Victim 1 on April 30, 2017. The video is approximately 32 seconds in duration and depicts Minor Victim 1 penetrating Minor Victim 2's vagina with his penis. Federal agents have reviewed this video and it meets the federal definition of child pornography.

On May 3, 2017, Special Agents obtained consent from the parents of Minor Victims 1 and 2, along with the consent of the victims themselves, to assume the identity of their Facebook accounts. Agents discovered that Minor Victim 1 had received Facebook messages from a different Facebook profile named "Jin Chun" beginning April 18, 2017, and ending on May 23, 2017. In one of these messages, "Jin Chun" sends a one-minute long video depicting Minor Victim 1 performing oral sex on Minor Victim 2 and penetrating her vagina with his fingers. The video sent to Minor Victim 1 by "Jin Chun" is one of the same videos Minor Victim 1 previously sent to "Roxanna Scarlett" and does meet the federal definition of child pornography.

On May 23, 2017, HSI McAllen was granted a federal search warrant for information pertaining to the Facebook profile of "Roxanna Scarlett" and Minor Victims 1 and 2.

On May 30, 2017, Facebook provided the requested information. A review of the Facebook returns reveals that in conversations with "Roxanna Scarlett", Minor Victim 1 stated that he was 15 years old. This statement was made prior to "Roxanna Scarlett" requesting pornographic videos of Minor Victims 1 and 2.

Special Agents searched for and identified "Jin Chun's" Facebook account with unique alias "tang.befresh." The account had several photos of an adult Asian male. There were also several photos of a light-colored Lexus with Virginia license plate VDZ-8517 in which the Asian male was seated in the driver's seat. A query of law enforcement databases indicated that the Lexus was registered to a Michael Tienpin TANG (hereinafter "TANG") with a residence located in Alexandria, Virginia.

Special Agents also searched for and identified the "Mike Boss" Facebook account, which also possessed many of the same photos found in "Jin Chun's" account, to include the photos of the Lexus.

A Customs Summons to Facebook indicated that all three Facebook accounts, "Roxana Scarlett," "Mike Boss," and "Jin Chun," had logged into their respective accounts from the same IP address of 68.100.48.79. HSI Special Agents, along with the Virginia State Police, identified this IP address to be owned by Cox Communications. A subpoena return from Cox Communications indicated that the IP address 68.100.48.79 was assigned to the same residential address as indicated above during the periods corresponding with the aforementioned violations.

To further identify TANG through various databases, the Virginia Sex Offenders database indicated TANG's residence as the same Alexandria, Virginia residence indicated above. Furthermore, the photo of TANG on the same database appears to be the same Asian male on "Mike Boss's" and "Jin Chun's" Facebook profiles. In addition, TANG's Virginia driver's license photo appears to be the same Asian male depicted in the Virginia Sex Offenders database. TANG's driver's license also indicates the same Alexandria, Virginia address as indicated above.

The results of the Facebook warrant also reveal that the "Roxanna Scarlett" profile reached out to over fifty minor victims on Facebook in an attempt to persuade them into sending child pornographic photos and/or videos of themselves. Several of these minor victims succumbed to "Roxanna Scarlett's" requests and produced images and/or videos of themselves engaging in sexually explicit conduct and then sent these depictions to "Roxanna Scarlett." Additionally, there were five victims that were coerced or threatened by "Roxanna Scarlett" to provide additional pornographic images and/or videos of themselves or risk exposure. In one instance, "Roxanna Scarlett" persuaded a minor male, Minor Victim 3, to sexually assault his 10-year-old sister by transmitting a video depicting Minor Victim 3 using his sister's hand to masturbate himself. "Roxanna Scarlett" then exposed Minor Victim 3 by further distributing this video when he did not meet a deadline for providing another video "Roxanna Scarlett" had requested, that would have depicted Minor Victim 3 performing oral sex with his younger sister.

TANG could be charged in the state of Texas with the criminal offense of indecency with a child, in violation of Texas Penal Code Section 21.11, for causing Minor Victim 1 and Minor Victim 2 to engage in sexual contact.